

Exhibit I

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

DR. AMY R. WOODS

PLAINTIFF

VS

CIVIL ACTION NO. 3:19-CV-00234-NBB-RP

MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION
JESSE WILLIAMS, INDIVIDUALLY;
AND JOHN DOES 1-9

DEFENDANTS

ZOOM DEPOSITION OF TRAVIS DAY

Taken at the Instance of the Plaintiff
With All Parties Appearing by Zoom Videoconferencing
On August 30, 2020
At 8:15 a.m.

REPORTED BY: SHARRON F. ALLEN, CSR, RPR
CSR NO. 1144

1 A. I don't remember if he said that
2 specifically.

3 BY MR. WAIDE:

4 Q. At that time were you aware that that's
5 what he was talking about when they had the
6 meeting? Do you know that's what the warden had
7 in mind?

8 MR. LONG-DANIELS: Objection to form.

9 A. No, I did not know, because I don't
10 know all that he knew. So no.

11 BY MR. WAIDE:

12 Q. Okay. You didn't know -- when you made
13 the report to the warden, I take it you didn't
14 know that he was going to pull her security
15 clearance, did you?

16 A. I did not expect that at all.

17 Q. All right. What did you think he would
18 do?

19 A. Well, what I expected to happen: That
20 there would be a conversation between myself,
21 the warden, Dr. Woods, and my supervisor -- is
22 what I expected.

23 Q. A conversation for what purpose? To do
24 what?

25 A. So we could lay everything out on the

1 table and everybody could understand and see the
2 other's point of view to see if we could, you
3 know, find a common ground.

4 Q. So did you think the warden was acting
5 improperly, then, by pulling her security
6 clearance?

7 MR. LONG-DANIELS: Objection to form.

8 A. I mean, I don't -- I don't know if he
9 was or if he wasn't. If you're asking me if
10 that's something that I would have done -- is
11 that what you're asking?

12 BY MR. WAIDE:

13 Q. No, sir. I'm just asking you whether
14 you thought the warden was doing anything
15 improper by pulling her security clearance, what
16 you thought about the warden doing that.

17 MR. LONG-DANIELS: Objection to form.

18 A. Well, my thoughts were that it was, you
19 know, maybe a knee-jerk reaction and to the
20 extreme.

21 BY MR. WAIDE:

22 Q. I see. Did you report that to anybody
23 above you, that you thought that the warden was
24 having a knee-jerk reaction and reacting to the
25 extreme?